

but an ongoing, changing and a “work in process” that has multiple opportunities for income and development. There is no better example of this than the pending sale of assets, which includes not only property of the estate but property owned by a third party. That is an important feature of this development in that the remaining area, also a development, “feeds” into the Debtor’s development. And, while the surrounding development is not technically titled to the Debtor, it is part of a planned unit development.

8. The Trustee denies the allegations, inferences and conclusions contained in Paragraph 8 of the Motion.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully prays that upon a hearing hereof this Honorable Court will enter its order denying the Motion. The Trustee prays for general relief.

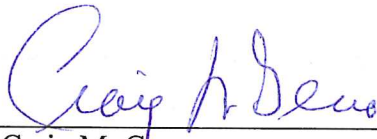
THIS, the 12 day of December, 2023.

Respectfully submitted,

CRAIG M. GENO, SUBCHAPTER V TRUSTEE

By His Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Christopher J. Steiskal, Sr., Esq.
Office off the United States Trustee
christopher.j.steiskal@usdoj.gov

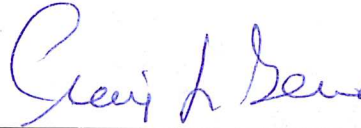
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THIS, the 12 day of December, 2023.



Craig M. Geno